

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: **Dawn Johnson** : Chapter 13
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Debtors : Bankruptcy No.: **18-13707\elf**

OBJECTION TO PROOF OF CLAIM

1. Debtors commenced this action on **September 8, 2018**, by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.
2. On or about **August 9, 2018**, **Wilmington Savings Fund Society** (hereinafter "Respondent") filed a Proof of Claim for pre-petition arrears in the amount of **\$22,323.21**. Said Proof of Claim includes Principal & interest due, prepetition fees due, escrow deficiency for funds advanced & projected escrow shortage in the aforesaid amount. **Attached hereto and marked as "Exhibit A" is a photocopy of said Proof of Claim.**
3. The pre-petition arrears attached to aforesaid Proof of Claim are inaccurate and do not give proper credit to all pre-petition payments made by Debtor.
4. In addition to prepetition fees due, escrow deficiency for funds advanced & projected escrow shortage are unreasonable and not actually incurred.

WHEREFORE, Debtors move this Honorable Court for an Order to reduce requested pre-petition arrears to the actual amount after proper credit is given to Debtor for all payments made and further Ordered that prepetition fees due, escrow deficiency for funds advanced & projected escrow shortage is reduced to reasonable amounts and/or amounts actually incurred.

/s/ Michael D. Sayles, Esquire
Michael D. Sayles
Attorney for Debtors
427 W. Cheltenham Avenue
Elkins Park, PA 19027-3201
215-635-2270 (phone)
215-424-1263 (fax)
midusa1@comcast.net